February 23, 1993



Mr. Pat Churilla
U.S. Environmental Protection Agency
Central Regional Laboratory
536 S. Clark Street
Chicago, IL 60605

RE: Albion-Sheridan Township Landfill, SAS 7652E, General Water Quality Parameters Analyzed by PBS&J.

Dear Pat:

WWES has received two data packages for SAS 7652E. SAS 7652E(1), SDG Number E01 was reviewed by James Redlin on 2-4-1993. SAS 7652E(2), SDG Number E19 was reviewed by L. Leonova on 2-10-1993.

I have read both reviews and am concerned that the two data packages may not have been consistently reviewed. The first data package qualified all of the ammonia and oil and grease as unusable. The second data package qualifies the oil and grease unusable but the ammonia is only qualified as estimated. The QA/QC procedures used appear to be similar or the same for both packages.

Similarly, TKN data in the first package is qualified as estimated but some of the TKN data in the second package is qualified as unusable. The QA/QC procedures used appear to be similar or the same for both packages.

Could you please have one person look at both packages simultaneously? I want to ensure that we are applying the same set of rules to both data packages.

I have already responded to the review performed on SAS 7652E(1), SDG Number E01 in a letter dated February 12, 1993. I would also like to similarly respond to the second review.

Pat Churilla February 23, 1993 Page 2

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On page 1 of 6, Total Dissolved Solids Analyses

It is indicated that 11 of 18 samples were analyzed using an aliquot of less than 100 ml/sample. WWES provided the laboratory with approximately 500 ml for this analysis.

On page 2 of 6, Ammonia Analyses, 1st paragraph, second sentence.

This should read "...yielded the same "0" peak height, 0.02 mg/L", not 0.2 mg/L.

On page 2 of 6, Ammonia Analyses, 2nd paragraph.

It is indicated that Samples E-30, E-31, and E-32 were not preserved (as per the COC form report). This is correct. These were medium level leachate samples. Per our QAPP, we were to preserve a test sample collected from the leachate well. If the sample effervesced upon preservation, then we were not to preserve the samples that we sent to the laboratory. This is is analogous to not preserving medium concentration samples for TCL and TAL analyses. During the test, the sample did indeed effervesce, hence, the samplers were instructed not to preserve these samples.

The sample, E-32, is the field blank for the corresponding investigative sample, E-30. The reviewer has qualified it unusable "due to possible elevation of the detection limit", presumably due to the preservation issue. The likelihood of this sample being "unusable" as opposed to leachate samples E-30 and E-31 (which were qualified as estimate) is slim. I would prefer to qualify E-32 as estimated, as well.

Page 3 of 6, Nitrate/Nitrite Analyses

Again, the reviewer points out that samples E-30, E-31 and E-32 were unpreserved. This is correct. Because these are medium level samples and purposely unpreserved, I would prefer to qualify them as estimated as opposed to unusable.

Page 4 of 6, TKN Analyses

Again, the reviewer points out that samples E-30, E-31 and E-32 were unpreserved. This is correct. Because these are medium level samples and purposely unpreserved, I would prefer to qualify them as estimated as opposed to unusable.

In addition, the field blank sample "E-32" was specifically collected to document our decontamination procedures for the collection of leachate from our leachate monitoring well. This field blank sample should therefore only affect samples E-30 and E-31. The

Pat Churilla February 23, 1993 Page 3

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review indicates that samples E-16, E-21, E-23, E-24, and E-35 are affected by the contamination in the field blank. This is incorrect.

Page 5 of 6, TOC and COD Analyses

Again, the reviewer points out that samples E-30, E-31 and E-32 were unpreserved. This is correct.

The sample, E-32, is the field blank for the corresponding investigative sample, E-30. The reviewer has qualified it unusable "due to possible elevation of the detection limit", presumably due to the preservation issue. The likelihood of this sample being "unusable" as opposed to leachate samples E-30 and E-31 (which were qualified as estimate) is slim. I would prefer to qualify E-32 as estimated as well.

Page 6 of 6, Other Qualifiers

As stated above, unpreserved sample E-32, only affects samples E-30 and E-31. Attempts to qualify other data based on this sample is not correct.

Pat, could you please call me when you receive this letter so we can discuss how best to proceed? Thank you very much.

Sincerely yours,

WW ENGINEERING & SCIENCE, INC.

Wyabeth M. Whl

Environmental Services Division

Elizabeth M. Uhl

Site Project Manager

cc: 04011, 32

(Mary Beth Novy, U.S. EPA RPM)

Wayne Schalk, WWES